

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF NEW YORK
ALBANY DIVISION

In re:

PRIME CAPITAL VENTURES, LLC

Chapter 11

Case No.: 24-11029

Debtor.

**UNITED STATES TRUSTEE'S APPLICATION FOR ORDER APPROVING
APPOINTMENT OF CHAPTER 11 TRUSTEE**

TO: THE HONORABLE ROBERT E. LITTLEFIELD, JR.,
UNITED STATES BANKRUPTCY JUDGE:

William K. Harrington, United States Trustee for Region 2, in furtherance of his duties and responsibilities set forth in 28 U.S.C. § 586(a) and in pursuant to Federal Rule of Bankruptcy Procedure 2007.1, hereby seeks an order approving his appointment of Yann Geron, Esq. as chapter 11 trustee in this case. In support of this application, the United States Trustee respectfully states as follows:

1. By Order entered June 5, 2025, this Court directed the United States Trustee to appoint a chapter 11 trustee in this case.

2. Pursuant to 11 U.S.C. § 1104(d), in the course of making the appointment, the United States Trustee consulted with the following parties-in-interest in this case and/or their counsel:

- a. William L. Esser, IV, Esq.
- b. Michael Patrick Everman, Esq.
- c. Douglas T. Tabachnik, Esq.
- d. Paul A. Levine, Esq.

- e. Edward LoBello, Esq.
- f. Marianne T. O'Toole, Esq.
- g. Stephen A. Donato, Esq.
- h. Chad P. Miesen, Esq.
- i. Fred Stevens, Esq.
- j. Lauren Kiss, Esq.
- k. Justin A. Heller, Esq.
- l. Matthew Michael Zapala, Esq.
- m. Jay Robert Bender, Esq.
- n. Christopher R. Bryant, Esq.
- o. Benjamin O. Gilbert
- p. Matthew F. Kye, Esq.
- q. Adam B. Lawler, Esq.
- r. Joseph P. Lombardo, Esq.
- s. Phoebe A. Wilkinson, Esq.
- t. Matthew A. Toporowski, Esq.
- u. Kevin J. Smith, Esq.
- v. Allen H. Martin, Esq.

3. After consultation with the parties-in-interest listed above, the United States Trustee selected Yann Geron, Esq. to serve as chapter 11 trustee in this case.

4. To the best of the United States Trustee's knowledge, Mr. Geron has no connections with the debtors, creditors, any other parties-in-interest, their respective attorneys,

the United States Trustee, and persons employed in the Office of the United States Trustee, other than those connections set forth on the Declaration of Disinterestedness of Yann Geron, Esq., attached hereto as Exhibit A.

WHEREFORE, the United States Trustee respectfully requests that the Court enter an Order Approving the Appointment of Yann Geron, Esq. as the chapter 11 trustee, pursuant to 11 U.S.C. §1104(a), and for such other and further relief as the Court deems just and proper. A proposed form of order is attached hereto as Exhibit B.

Dated: Albany, New York
June 5, 2025

Respectfully submitted,

WILLIAM K. HARRINGTON
UNITED STATES TRUSTEE, REGION 2

By: /s/ Lisa M. Penpraze
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